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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF
ENVIRONMENTAL
CLEANUP

SEP 2 8 2012

MEMORANDUM

Subject: Recommendation to Sign the Sitewide Ready for Anticipated Use Certification for the Vancouver Water Station # 1 Contamination Superfund Site, Vancouver, WA, ID #: WAD988519708

From: Nancy Harney, Remedial Project Manager
Office of Environmental Cleanup

Thru: Cyndy Mackey, Assistant Regional Counsel
Office of Regional Counsel

To: Cami Grandinetti, Manager
Remedial Cleanup Program

The Vancouver Water Station # 1 (WS1) Contamination Superfund Site (Site) is located in Vancouver, WA. It was listed on the National Priorities List (NPL) on May 31, 1994, and achieved Construction Completion on September 25, 1998, when U.S. EPA issued the Preliminary Closeout Report (PCOR) for the site based on the remedies selected in the ROD dated September 11, 1998. The Superfund Environmental Indicators for the Site are "Current Human Exposure Controlled and Protective Remedy in Place" and "Contaminated Ground Water Migration Under Control."

For the purposes of this decision, the Site consists of 10 groundwater production wells and a holding reservoir used to provide storage capacity to accommodate daily fluctuations in water demand. WS1 supplies drinking water to approximately 150,000 residents, or about one-half of the drinking water for Vancouver. The balance of drinking water is supplied by other similar wellfields in and around the city. Therefore, the current and reasonably anticipated future use of the land that is described as the Site is a drinking water production facility.

Institutional controls are not required for this Site because the City of Vancouver is required to provide safe drinking water to its residents under a variety of regulatory requirements including the Safe Drinking Water Act. WS1 is the main source of the city's drinking water. The city is obligated to maintain and safeguard its drinking water distribution system under requirements that are separate and distinct from CERCLA. The ROD did not call for Institutional Controls and subsequent five-year reviews confirmed that none are necessary for this site.

WSI is deemed ready for use as a drinking water production facility so long as the treatment system is correctly operated and regular monitoring is conducted.

The *Guidance for Documenting and Reporting the Superfund Sitewide Ready-for-Reuse Performance Measure* describes what it means to meet the SWRAU measure. In July, 2012 OSRTI produced a document titled "**Internal Frequently Asked Questions (FAQ) for Implementing the Sitewide Ready for Anticipated Use Performance Measure**" to answer frequently asked questions for considering whether a site meets the Sitewide Ready for Anticipated Use (SWRAU) Government Performance and Results Act (GPRA) measure.

FAQ #8 is "What kinds of sites might never meet the SWRAU measure? "and includes the following language:

> "Based on experience to date dealing with sites, there are three categories of sites that may not meet the SWRAU measure:
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> • Ground water-only sites: Ground water-only sites may not be able to achieve a SWRAU designation. However, if EPA has assessed the soil and surface contamination in a remedial investigation/feasibility study (RI/FS) and the surface area above the contaminated ground water is ready for its anticipated use, or if EPA performed removal actions that addressed all soil and other surface contamination, then the site may be eligible to be SWRAU." The answer also notes "For ground water sites that also have a vapor intrusion pathway, Regions should consider whether this pathway impacts current or future reasonably anticipated land uses."

Based on the RI/FS and ROD for the Site, with the exception of the groundwater, neither the PA/SI nor the soil evaluations done during the RI/FS identified either a plume or a discrete source of the contamination found in the wellfields that warranted any further investigation or cleanup under CERCLA.

According to the RI/FS:

> "Although several investigations have been conducted, neither a source nor a plume of PCE entering the well field has ever been identified. Soil - gas surveys conducted to the north of the well field detected the presence of PCE, TCE, TCA and toluene. The concentrations of PCE detected in the area, however, were not high enough to indicate a source of PCE that could be responsible for the contamination at the well field."

According to the ROD:

> "Although several investigations have been conducted, neither a source nor a plume of PCE entering the well field has ever been identified. Soil - gas surveys conducted to the north of the well field detected the presence of PCE, TCE, TCA and toluene. The concentrations of PCE detected in the area, however, were not

high enough to indicate a source of PCE that could be responsible for the contamination at the well field."

Given the depth to groundwater (approximately 200 feet) , the low concentrations of COCs found in recent monitoring events and the current and reasonably anticipated future land use as open space/park, there is no reason to believe vapor intrusion is an issue of concern.

Table 1: Impacted media and cleanup goals for the Site.

Impacted Media	Cleanup Goals
Groundwater	Even thought the risks presented in the baseline risk assessment are within the NCP acceptable risk range, it is necessary to take an action at WS 1 because groundwater has been shown to have persistent concentrations of PCE above the MCL. EPA's 1991 guidance (Role of the Baseline Risk Assessment in Superfund Remedy Selection Decisions) states the exceedances of the MCL can trigger the need for action. In addition, the NCP requires that MCLs must be met in groundwater, not just at the tap.
	To protect human health by reducing concentrations of PCE and other VOCs in drinking water produced by WS 1 to below the MCL specified in regulations promulgated under the federal Safe Drinking Water Act (SDWA) and in the state drinking water regulations. To protect human health by reducing concentrations of PCE and other VOCs in groundwater at WS 1 to below the Method A cleanup level specified in the Washington State Model Toxics Control Act (MTCA) regulations and below the federal and state drinking water standards (MCLs).

Table 2	
Construction Complete Date	September 25, 1998
Five Year Review Dates	September 10, 2008 and September 11, 2003
NPL Deletion Date	Planned - September 30, 2050
Existing Land Use/Status of Use	Well field that supplies drinking water to the city of Vancouver, WA
Anticipated Future Land Use	Well field that supplies drinking water to the city of Vancouver, WA
Total Site Acres	20 (per City/County parks website
Documents Reviewed for SWRAU Determination	RI/FS July 15, 1998, ROD September 11, 1998, 2nd Five Year Review September 10, 2008 and 1st Five Year Review September 11, 2003

The Review Team included Nancy Harney, Tim Brincefield and Susan Haas. The Team reviewed Site files and documents including the RI/FS, ROD and Five Year Reviews.

We find that the Site meets the following requirements:

- the Site has gone final on the National Priorities List;
- the Site has achieved Construction Completion;
- all cleanup goals in the ROD have been achieved for media that may affect current and reasonably anticipated future land uses, so that there are no unacceptable risks;
- the Superfund Sitewide Environmental Indicators for the Site are "Current Human Exposure Controlled and Protective Remedy in Place" and "Contaminated Ground Water Migration Under Control"; and,
- all institutional controls required in the ROD and warranted are in place.

Based on the information reviewed, we have determined that the Site meets all criteria for the Superfund Sitewide Ready for Anticipated Use Measure and recommend that you sign the attached Checklist documenting this determination.